

**STRAIN, DENNIS, MAYHALL & BATES, L.L.P.**

ATTORNEYS AND COUNSELORS AT LAW

318 ST. CHARLES STREET  
BATON ROUGE, LOUISIANA 70802  
TELEPHONE (225) 343-0100  
FAX (225) 343-0344  
E-MAIL BATES@SDMBLAW.COM

**JAMES C. BATES**  
PARTNER  
BATON ROUGE OFFICE

1018 HARDING STREET, SUITE 104  
P. O. BOX 53319  
LAFAYETTE, LOUISIANA 70505-3319  
TELEPHONE (337) 237-5900  
FAX (337) 233-9095

3838 N. CAUSEWAY BLVD., SUITE 2090  
METAIRIE, LOUISIANA 70002  
TELEPHONE (504) 830-7649  
FAX (504) 830-7635

P. O. BOX 41086  
HOUSTON, TEXAS 77241-1086  
TELEPHONE (832) 467-2180  
FAX (832) 467-2181

October 14, 2002

Hon. James H. Welsh  
Commissioner of Conservation  
P. O. Box 94275  
Baton Rouge, Louisiana 70804

Re: Robulus 1 Sand; Robulus 2 Sand; Robulus 3  
Zone; Robulus 4-5 Zone; Thibodaux Field,  
Lafourche Parish, Louisiana

Dear Commissioner Welsh:

Application is hereby made on behalf of Yuma Exploration & Production Company, Inc. to the Commissioner of Conservation for the calling of a public hearing, after legal notice, pertaining to the following matters relative to the Robulus 1 Sand, Robulus 2 Sand, Robulus 3 Zone, and Robulus 4-5 Zone, Thibodaux Field, Lafourche Parish, Louisiana:

**ROBULUS 1 SAND, RESERVOIR A**

1. To establish rules and regulations governing the exploration for and production of gas and condensate from the Robulus 1 Sand, Reservoir A, in the Thibodaux Field, Lafourche Parish, Louisiana;
2. To create a single drilling and production unit for the Robulus 1 Sand, Reservoir A, designated as the ROB 1 RA SU A, as shown on the plat attached hereto;

3. To force pool and integrate all separately owned tracts, mineral leases and other property interests within the units so created on a surface acreage basis of participation;
4. To allow the Commissioner of Conservation to reclassify the Reservoir by supplemental order, without the necessity of a public hearing, should the producing characteristics of the reservoir change and evidence to justify reclassification is submitted to and accepted by the Commissioner of Conservation;
5. To consider such other matters as may be pertinent to the Robulus 1 Sand.

The Robulus 1 Sand, was previously defined in Department of Conservation Order No. 324-D-1, effective March 1, 1963, and is hereby further defined as that gas and condensate bearing sand found between the depths of 12,580' and 12,626' in the National Energy Group, Inc. - Tregre No. 1 Well located in Section 12, Township 15 South, Range 16 East, Lafourche Parish, Louisiana.

#### **ROBULUS 2 SAND, RESERVOIR A**

1. To establish rules and regulations governing the exploration for and production of gas and condensate from the Robulus 2 Sand, Reservoir A, in the Thibodaux Field, Lafourche Parish, Louisiana;
2. To create a single drilling and production unit for the Robulus 2 Sand, Reservoir A, designated as the ROB 2 RA SU A, as shown on the plat attached hereto;
3. To force pool and integrate all separately owned tracts, mineral leases and other property interests within the units so created on a surface acreage basis of participation;
4. To allow the Commissioner of Conservation to reclassify the Reservoir by supplemental order, without the necessity of a public hearing, should the producing characteristics of the reservoir change and evidence to justify reclassification is

submitted to and accepted by the Commissioner of Conservation;

5. To consider such other matters as may be pertinent to the Robulus 2 Sand.

The Robulus 2 Sand was previously defined in Department of Conservation Order No. 324-F, effective March 1, 1963, and is hereby further defined as that gas and condensate bearing sand found between the depths of 12,779' and 12,889' in the National Energy Group, Inc. - Tregre No. 1 Well located in Section 12, Township 15 South, Range 16 East, Lafourche Parish, Louisiana.

#### **ROBULUS 3 ZONE, RESERVOIR B**

1. To establish rules and regulations governing the exploration for and production of gas and condensate from the Robulus 3 Zone, Reservoir B, in the Thibodaux Field, Lafourche Parish, Louisiana;
2. To create a single drilling and production unit for the Robulus 3 Zone, Reservoir B, designated as the ROB 3 RB SU A, as shown on the plat attached hereto;
3. To force pool and integrate all separately owned tracts, mineral leases and other property interests within the units so created on a surface acreage basis of participation;
4. To allow the Commissioner of Conservation to reclassify the Reservoir by supplemental order, without the necessity of a public hearing, should the producing characteristics of the reservoir change and evidence to justify reclassification is submitted to and accepted by the Commissioner of Conservation;
5. To consider such other matters as may be pertinent to the Robulus 3 Zone.

The Robulus 3 Zone, Thibodaux Field, was previously defined in Office of Conservation Order No. 326-P, effective October 13, 1998.

**ROBULUS 4-5 ZONE, RESERVOIR A**

1. To establish rules and regulations governing the exploration for and production of gas and condensate from the Robulus 4-5 Zone, Reservoir A, in the Thibodaux Field, Lafourche Parish, Louisiana;
2. To create a single drilling and production unit for the Robulus 4-5 Zone, Reservoir A, designated as the ROB 4-5 RA SU A, as shown on the plat attached hereto;
3. To force pool and integrate all separately owned tracts, mineral leases and other property interests within the units so created on a surface acreage basis of participation;
4. To allow the Commissioner of Conservation to reclassify the Reservoir by supplemental order, without the necessity of a public hearing, should the producing characteristics of the reservoir change and evidence to justify reclassification is submitted to and accepted by the Commissioner of Conservation;
5. To consider such other matters as may be pertinent to the Robulus 4-5 Zone.

The Robulus 4-5 Zone, Reservoir A, Thibodaux Field, consists of the Robulus 4 Sand previously defined in Department of Conservation Order No. 324-G, effective March 1, 1963, and the Robulus 5 Sand previously defined in Department of Conservation Order No. 324-E, effective March 1, 1963 and is hereby further defined as that gas and condensate bearing zone found between the depths of 13,176' and 13,462' in the National Energy Group, Inc. - Tregre No. 1 Well located in Section 12, Township 15 South, Range 16 East, Lafourche Parish, Louisiana.

The pre-application conference was held as scheduled on October 11, 2002. Present were the parties shown on the attached attendance list. The undersigned opened the conference and turned it over to Mr. David Comeaux, geologic consultant for the applicant, who discussed the bases for applicant's unit proposals. After a period of questions and answers the floor was opened for the presentation of potential counterplans. Mr. Ken LaGraize, on behalf of Bayou Exploration and others, indicated that he might present a counterplan at the hearing which moved the applicant's eastern boundary further to the east. It is unknown whether there will be opposition at the hearing.

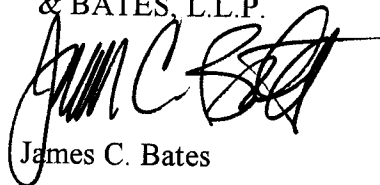
Hon. Philip N. Asprodites  
Commissioner of Conservation  
Page 5

All pertinent data relating to this application may be obtained **AT THE COST OF THE REQUESTING PARTY** from Leon E. Comeaux & Associates, P. O. Box 53922, Lafayette, Louisiana, 70505, (337) 233-9239.

Attached hereto and made a part hereof are plats outlining the ROB 1 RA SU A, ROB 2 RA SU A, ROB 3 RB SU A, and ROB 4-5 RA SU A in the Thibodaux Field, Lafourche Parish, Louisiana. Also enclosed to the Commissioner of Conservation and District Manager **ONLY** is a list of Interested Owners, Interested Parties and Represented Parties to whom a copy of this notice is being sent. Copies of this list will be provided upon request. A reasonable effort has been made to ascertain the names and addresses of all Interested Owners, Interested Parties or Represented Parties. Also enclosed is our check payable to the Office of Conservation, representing the required hearing application fee.

Very truly yours,

STRAIN, DENNIS, MAYHALL  
& BATES, L.L.P.



James C. Bates

JCB:mw

Enclosures

cc: Mr. Richard Hudson  
District Manager

Interested Parties  
Interested Owners  
Represented Parties

T 15 S - R 16 E 6

124

**PROPOSED UNIT**  
**Rob 1 Sand RA SUA**  
**Undrilled**  
**± 115 ACRES**

H.H.&H.  
Energy Realty  
B-2  
13,095'

H.H.&H.  
Energy Realty  
B-1  
13,068'

Energy Realty Investment Corp.

Maestri et al

54

NAD 27 LAMBERT LA SOUTH ZONE

55

NOTE: ALL BOUNDARIES ARE GEOGRAPHIC

56

57

58

59

EXHIBIT NO.  
DOCKET NO. 02-

**YUMA EXPLORATION & PROD. CO., INC.**

**THIBODAUX FIELD**  
**LAFOURCHE PARISH, LOUISIANA**

**PROPOSED UNIT**  
**Robulus 1 Sand**

Geology By: David Comeaux

0' 1000' 2000'

DATE:

**LEON E. COMEAUX & ASSOC. GEOLOGISTS**

T 15 S - R 16 E 6

**PROPOSED UNIT**  
**Rob 2 Sand RA SUA**  
**Undrilled**  
**± 115 ACRES**

Energy Rty. Inv. Corp.  
H.H.&H. Energy Realty  
B-2  
13,095'  
H.H.&H. Energy Realty  
B-1  
13,068'

Energy Realty Investment Corp.

H.H.&H. Tregre Unit 1  
14,566'

N.E.G. Tregre

APPROXIMATE BHL

PO 326-P



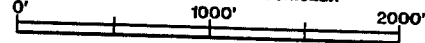
NOTE: ALL BOUNDARIES ARE GEOGRAPHIC

EXHIBIT NO.  
DOCKET NO. 02-

**YUMA EXPLORATION & PROD. CO., INC.**  
**THIBODAU FIELD**  
**LAFOURCHE PARISH, LOUISIANA**

**PROPOSED UNIT**  
**Robulus 2 Sand**

Geology By: David Comeaux



DATE:

**LEON E. COMEAUX & ASSOC. GEOLOGISTS**

T 15 S - R 16 E

**PROPOSED UNIT**  
**Rob 3 Zone RB SUA**  
**Undrilled**  
**± 115 ACRES**

H.H.&H.  
Energy Realty  
B-2  
13,095'

H.H.&H.  
Energy Realty  
B-1  
13,068'

Energy Realty Investment Corp.

H.H.&H.  
Tregre Unit 1  
1  
14,566'

APPROXIMATE  
BHL

AP0 326-P

N.E.G.  
Tregre

EXHIBIT NO.  
DOCKET NO. 02-

**YUMA EXPLORATION & PROD. CO., INC.**

**THIBODAUX FIELD**  
**LAFORCHE PARISH, LOUISIANA**

**PROPOSED UNIT**  
**Robulus 3 Zone**

Geology By: David Comeaux  
1000'

0' 2000'

DATE: **LEON E. COMEAUX & ASSOC. GEOLOGISTS**

NOTE: ALL BOUNDARIES ARE GEOGRAPHIC

NAD 27 LAMBERT LA. SOUTH ZONE

T 15 S - R 16 E

124

**PROPOSED UNIT**  
**Rob 4-5 Zone RA SUA**  
**Undrilled**  
**± 115 ACRES**

Plantation Trace

GEOGRAPHIC

APPROXIMATE  
BHL

APO 326-P

Subdivision

St. Maurice

17

H.H.&H.  
Energy Realty  
B-2  
13,095'

Energy Realty Investment Corp.

H.H.&H.  
Energy Realty  
B-1  
13,068'

Energy Realty Investment Corp.

N.E.G.  
Tregre  
14,534'VD  
15,600'MD

H.H.&H.  
Tregre Unit 1  
14,566'

Maestri et al

Alice Hidalgo Her

NAD 27 LAMBERT LA. SOUTH ZONE

EXHIBIT NO.  
DOCKET NO. 02-

**YUMA EXPLORATION & PROD. CO., INC.**

**THIBODAUX FIELD**  
**LAFOURCHE PARISH, LOUISIANA**

**PROPOSED UNIT**  
**Robulus 4-5 Zone**

Geology By: David Comeaux

0' 1000' 2000'

DATE

**LEON E. COMEAUX & ASSOC. GEOLOGISTS**

NOTE: ALL BOUNDARIES ARE GEOGRAPHIC